

DOCKET NO: KNL-CV19-6041790-S: SUPERIOR COURT

MOHEGAN TRIBAL GAMING AUTHORITY

D/B/A MOHEGAN SUN D/B/A MTGA : JUDICIAL DISTRICT OF

VS. : NEW LONDON AT NEW LONDON  
:

EUGENE MELNYK : JULY 30, 2019

EXHIBITS TO COMPLAINT

Plaintiff Mohegan Tribal Gaming Authority d/b/a Mohegan Sun  
d/b/a MTGA provides the attached exhibits referenced in its  
complaint pursuant to Practice Book Section 10-29.

MOHEGAN TRIBAL GAMING AUTHORITY  
PLAINTIFF

By: Russell L. London  
Russell L. London, Esq.  
London & London  
48 Christian Lane  
Newington, CT 06111-5451  
(860) 666-4500  
FAX: (860) 667-1245  
Email: rlondon@londonandlondon.com  
Juris # 406548

MOHEGAN TRIBAL GAMING AUTHORITY  
PLAINTIFF


By: 

Houston Putnam Lowry, Esq.  
Polivy, Lowry & Clayton, LLC  
6 Central Row-Second Floor  
Hartford, CT 06103  
(860) 560-1180  
FAX: (860) 560-1354  
Email: PTL@HPLowry.com  
Juris # 407964

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed  
on this 30<sup>th</sup> day of July, 2019 to:

Eugene Melnyk  
Crane Beach House  
St. Philip  
Barbados

  
Houston Putnam Lowry, Esq.

# EXHIBIT 1



# CASINO CREDIT APPLICATION

LIMIT REQUESTED:  
\$ 1,000,000

ACCOUNT #

NAME LAST FIRST  
MELNYK EUGENE

STREET ADDRESS OF RESIDENCE / CITY STATE ZIP CODE  
CRANE BEACH HOUSE

ST. PHILIP BARBADOS-WEST INDIES

RES. PHONE # # YEARS  
246-437-7080 10

DIRECT ALL CORRESPONDENCE TO:  
RESIDENCE ☒ OTHER ☐ NO MAIL

EMPLOYMENT-FIRM NAME (NOTE IF RETIRED)

BIOMAT LAB

POSITION

CEO

TYPE OF BUSINESS

PHARMACEUTICAL

STREET ADDRESS OF BUSINESS / CITY STATE ZIP CODE

CHELSEA PARK BLDG 2  
COWLYMORE ROCK  
ST. MICHAEL BARBADOS 20 BIS

BUS. PHONE # # YEARS  
246-437-7080 20

G.O.B. SOCIAL SECURITY NUMBER

[REDACTED]

APPROXIMATE AMOUNT OF ALL PERSONAL  
OBLIGATIONS INCLUDING MORTGAGES:

[REDACTED]

APPLICATION RECEIVED BY:

WALK-IN MAIL PHONE OTHER  
S.V. X

SIGNATURE J. Thompson UC # 808786 DATE 12-1-04

FOR OFFICE USE ONLY

DRIVERS LICENSE # STATE EXP. DATE

HEIGHT WEIGHT HAIR EYES CHECK IF  
5'10" 190 BRN BLU MALE FEMALE

PASSPORT NUMBER EXP. DATE COUNTRY  
[REDACTED] [REDACTED] CANADA

OTHER ID PRESENTED EXP. DATE ID NUMBER  
[REDACTED] [REDACTED] [REDACTED]

PHOTO ID: ☒ YES ☐ NO GENERAL DESCRIPTION ON ID: ☐ YES ☒ NO

ID TAKEN BY: DATE 12-2-04 TIME 12:30 AM/PM

SIGNATURE D. Seerino UC # 804157

CRT-SIGNATURE VERIFICATION: DATE 12/2/04 TIME 1:01 AM/PM

SIGNATURE [REDACTED] UC # 819936

CREDIT CARD NAME CARD NUMBER EXP. DATE

CREDIT CARD NAME CARD NUMBER EXP. DATE

BANK # - CHECKING AC  
BANK OF NOVA SCOTIA

BRANCH

SCOTIA PRIVATE CLIENT GR

STREET ADDRESS OF BANK / CITY STATE ZIP CODE

TORONTO Canada M5W2X6

BANK PHONE # P PERSONAL SOLE PROP.

ACCOUNT #

BANK # - CHECKING ACCOUNT ONLY?

TO CANADA TRUST

BRANCH

\* US ACCT \*

STREET ADDRESS OF BANK / CITY STATE ZIP CODE  
KRIS/ACCT MGR EMAIL ADDRESS ON FILE

TORONTO, ON

BANK PHONE # (CANADIAN #) X PERSONAL SOLE PROP.  
10432-004

ABA # ACCOUNT #

I am applying for credit, check-cashing and/or marker privileges from the Mohegan Tribal Gaming Authority ("MTGA") doing business as Mohegan Sun. I hereby certify that the information provided in my application is true and accurate and that I have not omitted or concealed material information. I understand that the MTGA is authorized by the National Indian Gaming Authority to operate Mohegan Sun as a gaming facility. I am providing information in this credit application as an inducement to the MTGA to grant me credit, to accept my check or marker, and/or to obtain cash or cash equivalents. I understand that if I omit material information or provide false or inaccurate information on my application, I may be subject to civil and/or criminal penalties. I understand that the MTGA has the right to revoke any credit extended to me, and to take action to collect any debt owed by me to the MTGA.

I understand that Mohegan Sun is established on the reservation lands of the Mohegan Tribe of Indians, a sovereign Indian nation, and that the MTGA has the same sovereign powers as the Mohegan Tribe. I understand that the Mohegan Tribe has enacted ordinances which govern civil liability on the reservation lands, and that the Mohegan Tribe has established a Mohegan Tribal Gaming Disputes Court which has jurisdiction over actions for the collection of debts from persons and entities to whom the MTGA has extended credit. I agree to abide by the laws and ordinances of the Mohegan Tribe and the MTGA.

I authorize the MTGA to: (a) investigate and to verify the information that I have provided; (b) review and analyze my credit record; (c) furnish information concerning my credit application to credit reporting agencies and others who may properly receive this information; and (d) take other steps consistent with the investigation and verification of my financial resources and financial responsibility.

I agree that the MTGA may in its sole discretion apply any and all chips or tokens which I rightfully possess to reduce any debt owed by me to the MTGA. I understand that if I fail to pay my debts to the MTGA upon demand, the MTGA may bring an action against me in Mohegan Tribal Gaming Disputes Court.

I understand that if the MTGA provides me with chips or tokens in exchange for a check or marker, the chips or tokens are the equivalent of cash, and I understand that a marker signed by me may be negotiated by the MTGA in the same manner as a check. I understand that if my check or marker is dishonored by a financial institution because of insufficient funds in the account, because the account was closed, because of a stop payment order or for any other reason, I may be exposed to criminal penalties in addition to any civil remedies that the MTGA may have against me.

I authorize the MTGA to collect the costs and reasonable attorney fees incurred in connection with efforts to collect any debt owed by me to the MTGA. I agree that the Mohegan Tribal Gaming Disputes Court may exercise personal jurisdiction over me, and that service of process and any summons, complaint, or other notice issued in connection with the collection of a debt owed by me may be delivered by registered or certified mail, or by any private delivery service such as Federal Express, to the address listed on my application (unless I provide the MTGA with written notice of a change of my address). I understand that a judgment of the Mohegan Tribal Gaming Disputes Court entered against me will be valid and enforceable the same as if it were entered in any state or federal court which could exercise personal jurisdiction over me.

PATRON'S SIGNATURE

CC.1  
(Rev. 04/03)

# EXHIBIT 2

MELNYK, EUGENE  
CRANE BEACH HOUSE  
ST PHILIP, Barbados 18079

ChkNbr 2090087  
03/19/17 23:57

Pay to the Order of MTGA

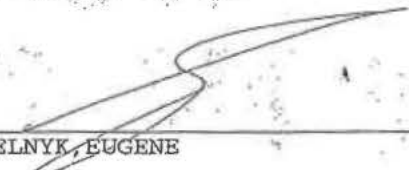
\$100,000.00

ONE HUNDRED THOUSAND DOLLARS & 00 CENTS  
PAYABLE IN UNITED STATES DOLLARS  
TORONTO DOMINION, BK

TORONTO,

Transit#: 10432-004

Account#: [REDACTED]

  
MELNYK, EUGENE

DEPOSIT ONLY TO  
MTGA  
BANK OF AMERICA  
ACCOUNT [REDACTED]

# EXHIBIT 3

MELNYK, EUGENE  
CRANE BEACH HOUSE  
ST PHILIP, Barbados 18079

ChkNbr 2090083  
03/19/17 23:37

Pay to the Order of MTGA

\$200,000.00

TWO HUNDRED THOUSAND DOLLARS & 00 CENTS  
PAYABLE IN UNITED STATES DOLLARS  
TORONTO DOMINION BK

TORONTO,

10432-004

Transit#:

Account#:

MELNYK, EUGENE

DEPOSIT ONLY TO  
MTGA  
BANK OF AMERICA  
ACCOUNT



# EXHIBIT 4

MELNYK, EUGENE  
CRANE BEACH HOUSE  
ST PHILIP, Barbados 18079

ChkNbr2090079  
03/19/17 23:07

Pay to the Order of MTGA

\$200,000.00

TWO HUNDRED THOUSAND DOLLARS & 00 CENTS  
PAYABLE IN UNITED STATES DOLLARS  
TORONTO DOMINION BK

TORONTO,

Transit#:

10432-004

Account#:

MELNYK, EUGENE

DEPOSIT ONLY TO  
MTGA  
BANK OF AMERICA  
ACCOUNT

# EXHIBIT 5

MELNYK, EUGENE  
CRANE BEACH HOUSE  
ST PHILIP, Barbados 18079

ChkNbr 2090019  
03/19/17 15:56

Pay to the Order of MTGA

\$200,000.00

TWO HUNDRED THOUSAND DOLLARS & 00 CENTS  
PAYABLE IN UNITED STATES DOLLARS  
TORONTO DOMINION BK

TORONTO,

Transit#:

10432-004

Account#:

MELNYK, EUGENE

DEPOSIT ONLY TO  
MTGA  
BANK OF AMERICA  
ACCOUNT

# EXHIBIT 6

MELNYK, EUGENE  
CRANE BEACH HOUSE  
ST PHILIP, Barbados 18079

ChkNbr 2089608  
03/17/17 21:55

Pay to the Order of MTGA

\$200,000.00

TWO HUNDRED THOUSAND DOLLARS & 00 CENTS  
PAYABLE IN UNITED STATES DOLLARS  
TORONTO DOMINION BK

TORONTO,

10432-004

Transit#:

Account#:

MELNYK, EUGENE

DEPOSIT ONLY TO  
MTGA  
BANK OF AMERICA  
ACCOUNT